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and

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Attorneys for Defendants,
Walmart Inc. and Jetson Electric Bikes, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH)	
Individually and as Parent and Legal Guardian)	
of W.W., K.W., G.W., and L.W., minor children)	
and MATTHEW WADSWORTH,)	
)	Case No. 2:23-cv-00118-NDF
Plaintiffs,)	
)	
v.)	DECLARATION OF
)	EUGENE M. LAFLAMME
WALMART INC. and)	IN SUPPORT OF MOTION TO
JETSON ELECTRIC BIKES, LLC,)	EXCLUDE TESTIMONY OF
)	JEFF SHEAMAN
Defendants.)	
)	

I, Eugene M. LaFlamme, state as follows:

1. I am an attorney at McCoy Leavitt Laskey LLC located in Waukesha, Wisconsin.
2. I am one of the attorneys of record for Defendants, Jetson Electric Bikes, LLC and Walmart Inc., admitted *pro hac vice* on August 24, 2023.
3. This case involves a February 1, 2022 residential fire in Green River, Wyoming.
4. The primary liability dispute between the parties is whether the fire originated at a Jetson Plasma hoverboard by the bedroom door of G.W. and L.W.'s bedroom or a smoking shed located outside the bedroom window of G.W. and L.W.
5. I attended the depositions of Green River Sheriff's Department Detective Sergeant Jeff Sheaman taken on November 16, 2023.
6. Plaintiffs filed their expert disclosures on July 15, 2024. Jeffrey Sheaman was not named or designated as an expert witness.
7. Attached as Exhibit 1 are the pertinent portions of passerby Ryan Pasborg's deposition taken on November 15, 2023.
8. Attached as Exhibit 2 are the pertinent portions of Green River Sheriff Department's Detective Sergeant Jeff Sheaman's deposition taken on November 16, 2023.
9. Attached as Exhibit 3 are the pertinent portions of Plaintiffs' origin and cause expert Michael J. Schulz's deposition taken on September 10, 2024.
10. Attached as Exhibit 4 are the pertinent portions of Plaintiff Stephanie Wadsworth's deposition taken on February 27, 2024.
11. Attached as Exhibit 5 are the pertinent portions of Plaintiff Matthew Wadsworth's deposition taken on February 26, 2024.

12. Attached as Exhibit 6 is a true and correct copy of Detective Sergeant Jeff Sheaman's report dated February 1, 2022, previously marked as Sheaman Deposition Exhibit 16.

13. Attached as Exhibit 7 is a true and correct copy of the structure diagram prepared by Apex's Austin Birdsong, previously marked as Schulz Deposition Exhibit 98.

14. Attached as Exhibit 8 is a true and correct copy of the evidence logs prepared by IC Specialty Services' Origin and Cause Investigator Cristal VanDongen, BSc, CFI, CFEI, CVFI.

15. Attached as Exhibit 9 is a true and correct copy of the sign-in sheet from the October 30, 2023 Laboratory Examination at Palmer Engineering and Forensics.

16. Attached as Exhibit 10 is a true and correct copy of the expert report prepared by Fire Dynamics Analysts' Gregory E. Gorbett, Ph.D., IAAI-CFI, CFEI, CFII, CFPS, CVFI dated September 9, 2024.

17. Attached as Exhibit 11 is a true and correct copy of the expert report prepared by AEI Corporation's Brian N. Strandjord, PE, CFI, CFEI dated September 13, 2024.

18. Attached as Exhibit 12 is a true and correct copy of NFPA 921 (2021 ed.) sections 3.3.9, 4.2, 4.3 to 4.3.7, 4.3.9, 4.4.5, 18.4 and 19.4.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: December 2, 2024



Eugene M. LaFlamme